

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

JOSEPH KENT,

Plaintiff,

v.

POOLTOGETHER, INC.; DHARMA LABS,  
INC.; OZONE NETWORKS, INC.;  
LEIGHTON CUSACK; KAIN WARWICK;  
STANISLAV KULECHOV; DRAGONFLY  
DIGITAL MANAGEMENT, LLC;  
NASCENT US, LLC; NASCENT LIMITED  
PARTNERSHIP; STICHTING MAVEN 11  
FUNDS; GALAXY DIGITAL TRADING  
HK LIMITED, LP; PARAFI CAPITAL, LP;  
and COMPOUND LABS, INC.,

Defendants.

Case No. 21-cv-6025-FB-CLP

**NOTICE OF DHARMA LABS, INC.  
AND OZONE NETWORKS, INC.'S  
MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of their Motion to Dismiss Plaintiff's Complaint, dated April 19, 2021, defendants Dharma Labs, Inc. and Ozone Networks, Inc. (together, "Dharma"), by their undersigned attorneys, will and hereby do move this Court, before the Honorable Frederic Block, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East Brooklyn, New York 11201, on a date and time to be designated by the Court, for an order dismissing Plaintiff's Complaint for lack of subject matter jurisdiction under Federal Rules of Civil Procedure 12(b)(1) and failure to state a claim under Federal Rule of Civil Procedure 12(b)(6).

DATED: April 19, 2022

By: /s/ John P. Amato

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